



U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

March 17, 2021

BY CM/ECF

The Honorable Colleen McMahon Chief United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: United States v. Amir Bruno Elmaani, 20 Cr. 661 (CM)

Dear Chief Judge McMahon:

The Government writes to respectfully request that the Court adjourn the status conference presently scheduled for March 31, 2021, and set a control date of 60 days from that date. Defense counsel joins in this request. The discovery produced in this case has been voluminous, and defense counsel would like additional time to review the discovery and discuss a potential pretrial disposition of the case with his client.

The Government requests that time be excluded through the control date under the Speedy Trial Act, 18 U.S.C. § 3161, so that defense counsel may review discovery and engage in these discussions. Defense counsel consents to the exclusion of time.

Respectfully submitted,

AUDREY STRAUSS United States Attorney for the Southern District of New York

By:___/s Margaret Graham_____

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